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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**VERIFIED STATEMENT OF THE AD HOC GROUP OF
SELF-FUNDED HEALTH PLANS PURSUANT TO RULE
2019 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure, the Ad Hoc Group of Self-Funded Health Plans (the “SF Group”) respectfully submits the following Verified Statement:

¹ The Debtors in these cases, and the last four digits of their registration numbers in this jurisdiction are Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters are located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

1. The SF Group currently consists of three self-funded union plans.
2. The SF Group has retained Shepherd, Finkelman, Miller & Shah, LLP (“SFMS”) as bankruptcy counsel in the Debtors’ Chapter 11 proceedings before this Court. SFMS maintains offices in Philadelphia at 1845 Walnut Street, Suite 806, Philadelphia, PA 19103 and in New York City at 52 Duane Street, Seventh Floor, New York, NY 10007.
3. A list of the members of the SF Group, each a party-in-interest, is attached as Exhibit “A.” Each of these entities holds unliquidated claims against the Debtors and represent a category of claimant that collectively holds billions of dollars in unliquidated claims.
4. The SF Group makes no representation herein as to the amount, validity, or priority of any particular member’s claims and expressly reserves all respective rights thereto.
5. This Verified Statement and the attached Exhibit should not be read to waive or limit any of the rights of the members comprising the SF Group to assert, file, or amend any claims in accordance with applicable procedures established by this Court.
6. The SF Group reserves the right to amend or supplement this Verified Statement as necessary in accordance with Rule 2019 of the Federal Rules of Bankruptcy Procedure.
7. The foregoing is true and accurate to the best of the undersigned’s knowledge, information, and belief.

Dated: June 9, 2020

Respectfully submitted,

SHEPHERD, FINKELMAN, MILLER
& SHAH, LLP

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EXHIBIT A

Asbestos Workers Local No. 32 Welfare Fund is a self-funded benefits plan created to provide health care coverage for Asbestos Workers Local No. 32, a union with a membership of 800 and headquartered at 318 Cleveland Avenue, Highland Park, New Jersey 08904.

BCTGM Local 53 Health Benefits Fund is a self-funded benefits plan created to provide health care coverage for Bakery, Confectionery, Tobacco Workers, and Grain Millers Local 53, a union with a membership of 3,750 and headquartered at 85 Orient Way, 2nd Floor, Rutherford, NJ 07070.

Sheet Metal Workers Local No. 25 Health & Welfare Fund is a self-funded benefits plan created to provide health care coverage for Sheet Metal Workers Local No. 25, a union with a membership of 2,500 and headquartered at 440 Barell Avenue, Carlstadt, NJ 07072.

Local 274 Health & Welfare Fund is a self-funded benefits plan created to provide health care coverage for Local 274, a union with a membership of 1,500 and headquartered at 20 Brace Road, Suite 114, Cherry Hill, New Jersey, 08034.